From: "McCallum, Thomas O." <TOMCCALL@southernco.com>
To: "Christian Araguas" <CJA2@nrc.gov>
Date: 7/17/2006 6:32:15 PM
Subject: AR-06-1466 RIS-06-06 Response.pdf

FYI, this was sent today. I don't think there are any surprises here.

<<AR-06-1466 RIS-06-06 Response.pdf>>

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Created By: TOMCCALL@southernco.com

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None

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U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating Company
Response to RIS 2006-06, "New Reactor Standardization Needed to Support the Design-Centered Licensing Review Approach"

Ladies and Gentlemen:

In the subject Regulatory Issue Summary (RIS), the Nuclear Regulatory Commission (NRC) indicated that it is developing a resource estimates and project plan for a Design Centered Review Approach (DCRA) strategy. To support this effort, the NRC identified several specific schedule and standardization information items that would be useful in their preparation.

Southern Nuclear Operating Company (SNC) supports and endorses the design-centered review approach proposed by the NRC. Responses to the specific bulleted items from the RIS are provided in Enclosure 1 for the Southern Nuclear Vogtle ESP and COL activities. This information has been coordinated with the AP1000 Reference Plant information being provided by NuStart for the Bellefonte Project.

If you have any questions or need any additional information, please contact Charles Pierce at (205) 992-7872.

Sincerely,

J. A. (Buzz) Miller

TOM/CRP

cc: Southern Nuclear Operating Company
Mr. J. B. Beasley, Jr., President and CEO
Mr. J. T. Gasser, Executive Vice President, Nuclear Operations
Mr. D. E. Grissette, Vice President, Plant Vogtle
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Mr. C. J. Araguas

Georgia Power Company
Mr. O. C. Harper, Vice President, Resource Planning and Nuclear Development

Enclosure 1
Southern Nuclear Response to NRC RIS 2006-006
New Reactor Standardization Needed to Support the
Design-Centered Licensing Review Approach

Southern Nuclear Operating Company (SNC) intends to submit both an early site permit (ESP) and combined license application (COL) for two new Westinghouse AP-1000 reactors for the Vogtle site. Each RIS 2006-006 information request regarding these Vogtle applications is addressed below. The information provided in response to RIS 2006-06 has been coordinated with the AP1000 Reference Plant response.

Information Request #1: Whether applicants for the four designs discussed in this RIS will be organized into design-centered working groups (DCWGs); if so, the schedule for such organization and, if a single point of contact is designated for the DCWG, the contact's identity.

Response: Southern Nuclear intends to submit an ESP and COL separately for two new reactors of the AP1000 design. The companies currently identified as having intent to submit a combined license application for the AP1000 design have organized into a DCWG, as discussed with the NRC Staff previously.

Peter Hastings of Duke Energy has been identified as the AP1000 Reference Plant Licensing Lead for NuStart and NRC point of contact for the AP1000 DCWG.

Information Request #2: If a design-centered program is followed for a particular design, which applicant referencing the design will be designated as the R-COL applicant. In addition, when will (month and year) each of the COL applications be submitted for review?

Response: For the new reactors of the AP1000 design, the reference combined license (R-COL) applicant will be the Bellefonte Project, as discussed with the NRC Staff previously. SNC is also a member of NuStart. SNC plans to submit the Vogtle COL application in March of 2008. This date will lag the projected R-COL application date, and will also lag the Vogtle Early Site Permit (ESP) submittal by just over eighteen months. The eighteen month lag between the ESP and COL allows for possible NRC decisions on the technical and environmental elements of the Vogtle ESP prior to the submittal of the COL. The SNC ESP and COL submittal dates are based on an initial operating date of the first new unit at Vogtle in mid-2015, should we elect to proceed with construction.

The Bellefonte Project COL application is expected to be the earliest COL application for the AP1000 design. This date is addressed on several key assumptions. This is further addressed in the Bellefonte Project R-COL response to this RIS.

Changes to SNC's schedule (e.g., as a result of changes in the assumptions above or additional detailed planning) will be communicated promptly to the NRC Staff.

Information Request #3: Whether applicants implementing the DCRA intend to provide RAI responses within the typical 30-day period.

Response: For requests for additional information (RAIs) concerning standardized content, Southern Nuclear expects to provide conforming or clarifying responses, as applicable, within 30 days or less of the R-COL application RAI responses. For plant-specific RAIs, Southern Nuclear expects to provide most

Enclosure 1
Southern Nuclear Response to NRC RIS 2006-006

RAI responses within a typical 30-day period. Longer periods may be necessary for RAIs requiring substantial new evaluation or analysis, or consisting of a substantial number of questions. When it is determined the typical 30-day response period cannot be met, SNC will contact the NRC Project Manager and reach agreement on a schedule for providing the response to the NRC. Additionally, a typical 30-day period would be contingent on pre-request discussions between NRC and Southern Nuclear so that the information needs included within the RAIs are well understood (similar to the process used on the three original ESP application reviews and on recent application reviews).

Information Request #4: To what degree standardization will be achieved, appropriately documented, and replicated in COL applications. Specifically, what portions of the R-COL application (chapter by chapter, section by section, subsection by subsection) will be standardized (i.e., replicated verbatim) in S-COL applications and what portions of the application are likely to be site-specific.

Response: Southern Nuclear supports and endorses the design-centered review approach proposed by the NRC. Standardization is expected to be substantial for the AP1000 COL applications as addressed in the Bellefonte Project R-COL response to this RIS, which included a current AP1000 standardization matrix (on a subsection-by-subsection basis).

Southern Nuclear expects to incorporate standardized material for the Vogtle COL to the full extent practical. However, because SNC will be submitting an ESP for the Vogtle site over a year before the R-COL submittal for Bellefonte, there are elements of the Vogtle ESP that may differ from the standard R-COL for Bellefonte. It is projected that this will have little impact on the ability of Southern Nuclear to submit a highly standardized COL, as the ESP primarily presents site-specific sections (e.g., SAR sections 2.4 on hydrology and 2.5 on geology).

Information Request #5: Whether, for each design-centered program, the vendor and applicants intend to submit pre-application topical reports for staff review. If so, how many? For each such report anticipated, please summarize the report scope and content and the proposed submittal schedule.

Response: Submittal of pre-application topical reports for the AP1000 DCWG is addressed in the Bellefonte Project R-COL response to this RIS.

Southern Nuclear has not identified any site-specific pre-application topical reports for staff review. Future discussions with the NRC Staff may result in the identification of additional site-specific information for early submittal.

Information Request #6: Whether any applicants intend to apply for an ESP prior to submitting their COL applications. If so, when (month and year) would the proposed ESP be submitted to the NRC for review?

Response: Southern Nuclear intends to apply for an ESP for the Vogtle site prior to submitting the COL application. This ESP application will be submitted for NRC review on August 15, 2006.